

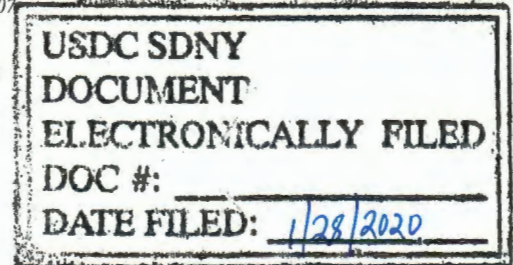


U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 28, 2020



BY ECF

Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Gilbert Oliver, et al.*, 19 Cr. 568 (SHS)

Dear Judge Stein:

MEMO ENDORSED

The Government respectfully writes to request a one-week adjournment of the pre-trial filing deadlines in the above-captioned case. The trial in this matter is scheduled to commence on March 2, 2020. Under the Court's current schedule, the parties are required to file a request to charge, motions *in limine*, and voir dire by February 4, and any oppositions to the motions *in limine* by February 11.

Both defendants have indicated a desire to plead guilty in advance of trial. A change of plea hearing is currently scheduled for defendant Hugh Witter on February 6 at 4:30 PM. Counsel for defendant Gilbert Oliver and the Government are in negotiations regarding a plea offer extended by the Government, that is likely to resolve pre-trial, but may not resolve before the February 4 filing deadline. The requested extension will permit the parties time to resolve these outstanding issues promptly, moot the need for the filing deadlines, and conserving the parties' and the Court's resources.

Defense counsel for Hugh Witter and Gilbert Oliver both consent to the Government's request.

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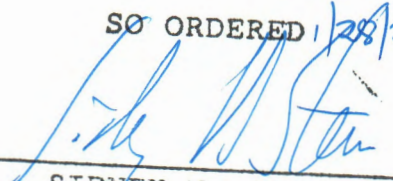
Wherefore, the Government respectfully requests that the Court grant a one-week adjournment of the February 4 and 11 filing deadlines in this matter.

Respectfully,

GEOFFREY S. BERMAN
United States Attorney

By: /s/
Sarah Mortazavi
Assistant United States Attorney
(212) 637-2520

CC: Ezra Spilke, Esq. (by ECF)
Kenneth J. Montgomery, Esq. (by ECF)

SO ORDERED 1/28/2020

SIDNEY H. STEIN
U.S.D.J.